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9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JACQUELINE CAMMILLE BASS,
15 Defendant.

Case No. 2:21-MJ-00790-VCF-1

**STIPULATION TO CONTINUE
BENCH TRIAL**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Jean Ripley, Assistant United States Attorney, counsel for
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and
20 Aden Kebede, Assistant Federal Public Defender, counsel for Jacqueline Cammille Bass, that
21 the bench trial currently scheduled on April 20, 2022 at 9:00 am, be vacated and continued to a
22 date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

24 1. Additional time is needed for defense counsel to confer with the defendant
25 regarding a pending plea agreement and review of discovery.
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2. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code § 3161(h)(7)(B)(iv).

This is the second request for a continuance of the bench trial.

DATED this 14th day of April, 2022.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Aden Kebede
By _____
ADEN KEBEDE
Assistant Federal Public Defender

/s/ Jean Ripley
By _____
JEAN RIPLEY
Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 JACQUELINE CAMMILLE BASS,

5 Defendant.
6

Case No. 2:21-MJ-00790-VCF-1

FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER

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8 **FINDINGS OF FACT**

9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
10 Court finds that:

11 1. Additional time is needed for defense counsel to confer with the defendant
12 regarding a pending plea agreement, to review the discovery and conduct any follow up
13 investigation necessary, to engage in pretrial motion practice, if necessary, and to further
14 prepare for trial.

15 2. Additionally, denial of this request for continuance could result in a miscarriage
16 of justice. The additional time requested by this Stipulation is excludable in computing the time
17 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
18 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code
19 §§ 3161(h)(7)(B) and 3161(h)(7)(B)(iv).

20 This is the first request for a continuance of the bench trial.
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CONCLUSIONS OF LAW

The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for trial, taking into account the exercise of due diligence.

The continuance sought herein is excludable under the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), when the considering the facts under Title 18, United States Code, § 316(h)(7)(B)(iv).

ORDER

IT IS THEREFORE ORDERED that the bench trial currently scheduled on Wednesday, April 20, 2022 at 9:00 a.m., be vacated and continued to May 25, 2022 at the hour of 9:00 a.m.

DATED this 15th day of April, 2022.



UNITED STATES MAGISTRATE JUDGE